

4810-8686-6440, v. 1

EXHIBIT C

1 RSPN
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13 UNITED STATES DISTRICT COURT
14
15 STATE OF NEVADA

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17 JOYCE ZAIC,)
18 Plaintiff,) CASE NO.: 2:10-cv-01814-PMP-LRL
19
20 v.

21 LAS VEGAS METROPOLITAN POLICE
22 DEPARTMENT a political subdivision of
23 the STATE OF NEVADA; DANIELLE
24 PIEPER, individually; B. EAGER, P#6189,
25 individually and in his official capacity as a
1 police officer; T. FREDERICK, P#9793,
2 individually and in his official capacity as a
3 police officer; SUNRISE
4 MOUNTAINVIEW HOSPITAL, INC.;
5 NEAL, security guard for MOUNTAIN
6 VIEW HOSPITAL; CHRISTOPHER
7 SIMMS, security guard for MOUNTAIN
8 VIEW HOSPITAL; JOHN DOES I through
9 X, and ROE CORPORATIONS I through X,
10 inclusive;

11 Defendants.

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28 **PLAINTIFF'S RESPONSES TO DEFENDANTS MOUNTAINVIEW HOSPITAL, NEAL
MILLOT AND CHRISTOPHER SIMMS' FIRST SET OF INTERROGATORIES**

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30 TO: Defendant, MOUNTAINVIEW HOSPITAL, NEAL MILLOT AND CHRISTOPHER
31 SIMMS;
32 TO: MICHAEL E. PRANGLE, ESQ. and CASEY W. TYLER, ESQ. of HALL, PRANGLE &
33 SCHOONVELD, their attorneys.

34
35 COMES NOW, the Plaintiff, JOYCE ZAIC, by and through her counsel, CAL J. POTTER,

1 III, ESQ. and JOHN C. FUNK, ESQ., of POTTER LAW OFFICES, and produces Plaintiff's
2 Answers to Defendants Mountainview Hospital, Neal Simms' First Set of Interrogatories as
3 follows:

4 **PRELIMINARY STATEMENT**

5 Plaintiff, JOYCE ZAIC, has not yet completed her discovery and investigation for the
6 preparation of this case for trial. Accordingly, the answers set forth herein are provided without
7 prejudice to the responding party's right to produce any subsequent discovered facts or
8 interpretations thereof and/or to add, modify or otherwise change or amend the answers herein. The
9 information hereinafter set forth is true and correct to the best of the Plaintiff's knowledge at this
10 particular time, but is subject to correction for inadvertent errors or omission, if any, such error or
11 omissions are found to exist.

12 **INTERROGATORIES**

13 **INTERROGATORY NO. 1:**

14 Please state your full name as well as your current resident address, social security number,
15 date and place of birth, and any other name by which you have ever been known.

16 **ANSWER TO INTERROGATORY NO. 1:**

17 Joyce Marilyn Zaic; 4116 Rubidoux Dr., Las Vegas, NV 89108; DOB: February 2, 1968.

18 **INTERROGATORY NO. 2:**

19 Describe in detail how the incident described in the complaint happened, including all actions
20 taken by you to prevent the incident.

21 **ANSWER TO INTERROGATORY NO. 2:**

22 Mountain View and their security guards conspired along with several nurses and doctors to
23 allow my father to die by taking him off life support and kicking me out of the hospital and have
24 me falsely arrested so I could not be there to stop them.

25 Dr. Rebecca Sinai admitted in a family meeting that she wanted my father to die. March 2,
26 2008, Dr. Sinai barged into a closed door meeting in a frantic state demanding that my father be
27 taken off life support. My father was in the next room sleeping and recovering from the botched
28 unneeded pacemaker operation he received from Dr. Sinai's orders a few hours prior. Dr. Sinai
ordered a pacemaker be put inside my dad without doing any tests. Then when complications arose
from the unneeded pacemaker, she wanted my dad to be taken off life support. She refused to allow
my dad to leave the hospital and check himself out. She and Dr. Timothy Hamilton, the cardiologist

1 demanded that my dad have another operation at the Mountain View hospital, even though
2 Mountain View was not equipped with the machinery to do open heart surgery and the nurses were
3 not qualified to treat patients with open heart surgery. She refused to allow me to check him out.
(The meeting was recorded).

4 The next day, another doctor took the liquid sleeping pills off my dad and he woke up. Dr.
5 Sinai tried to take my father off life support while he was peacefully sleeping while on Doctor
6 prescribed sleeping pills and recovering from the pacemaker complications. A few hours prior to
7 my father waking up and taken off sleeping pills, Dr. Sinai demanded that my dad is in a coma and
he be taken off life support. He was not in a coma, and he was only in a drug induced sleep. I
stopped them from doing so. (meeting was recorded)

8 Dr. Sinai also stated in the meeting that she was not my father's doctor. However, she is the
9 doctor that ordered the unneeded pacemaker without blood tests and within minutes of him being
10 admitted into the hospital. Her signature is on the pacemaker order. She ordered it. She failed to
11 order my dad's medical history from his primary prior to ordering the pacemaker. In addition, my
12 dad was only in the hospital for a check up and did not need a pacemaker. She demanded that he
have a pacemaker.

13 February 29, 2008, the pacemaker was placed into my dad within minutes of him being there
14 for a simple checkup, then he never left the hospital. They refused to allow him to leave. He asked
15 to check himself out and they would not allow him to do so. They did needless operations on him.
16 They performed 12 procedures on him in the three weeks he was there, until they finally took him
off life support on March 23, 2008. The hospital was not insured by my father's insurance company,
therefore, they should never have operated on my father with the initial pacemaker operation.

17 Security started harassing me on March 1, 2008, the day after the operation and continued
18 harassing me until my father died on March 23, 2008.

19 Several nurses would not tell me any information concerning my father's health. They kept
20 me and my father in the dark concerning his health. They refused to talk to me about my dad. They
21 said they were instructed not to give me any information on my dad's health and they are legally not
allowed to discuss patients health and only a doctor is allowed to discuss the patients health.

22 To resolve the problem, I tried speaking to the Chief of ICU nursing "Todd Isball, and Chief
23 of the entire hospital nursing Helen Voss (she told me she oversees the entire hospital and nobody
24 is above her and she makes the final decisions). After speaking to Helen Voss, she laughed at me
25 and called security on the phone. Security came to Helen Voss's office and physically forced and
26 took me out of the building. I asked her for help and she refused to help. From home, after security
kicked me out, I then tried calling on the phone asking who is in charge of the whole hospital, and
the PBX operator kept transferring me to Chris Simms, the chief of security.

27 I also tried resolving the problem by requesting the help of several of my dad's doctors. I
28 asked Dr. Paul Herren for help. Dr. Herren laughed at me, threw his arms in the air and nodded his

1 head no, then stated that he does not get involved with the nurses' business and their decisions and
2 that he isn't allowed to give orders to the nurses and they have their own boss they answer to. He
3 then turned and quickly rushed away before I could ask him another question about my dad's health.
4 My mother also tried asking him questions on several other occasions and he ignored her, the same
as the other doctors did to me.

5 I also tried asking the doctor and several other doctors for help that I managed to see in ICU
6 at the time, including Dr. Robert Lampert, and the cardiac surgeon Dr. Timothy Hamilton. They
7 refused to discuss my dad's health with me. Dr. Lampert stated it is against the law to discuss the
8 patients health with anybody other then the patient . I told him, but I am his daughter and my dad
9 is incapacitated and on a breathing machine. He just walked away from me and ignored me and Dr.
10 Timothy Hamilton yelled at me and said he is busy in a hostile voice. Cardiac surgeon Dr. Timothy
Hamilton also never discussed or had a meeting with us to discuss the surgery. None of the 12
procedures were discussed with us. They stated they are not allowed to discuss surgery with
anybody but the patient.

11 To resolve the problem, I also tried calling my dad's primary physician, Dr. Leon Rosky,
12 D.O. He never returned the phone calls. I obtained my dad's medical records from Dr. Leon
13 Rosky's office and all my phone calls are electronically documented with no return calls. Dr. Rosky
14 and his office staff also ignored my calls concerning my dad's health. I told them it is an
emergency, but they still never returned the calls. They edited their electronic notes.

15 March 11, 2008, I was assaulted by security guards and forced to leave the hospital by
16 security guards after I went to the Chief nurse Helen Voss for help the day after my dads open heart
17 surgery. I went to her office because the nurses in ICU refused to let me see my dad right after his
18 surgery and the day after his surgery on March 11, 2008. ICU nurses on duty refused to tell me the
status of my fathers health. They simply ignored me and then kicked me out. I asked the charge
nurse for help and she ignored me as if I didn't exist. She intentionally ignored me.

19 Some nurses allowed me to be with my dad and encouraged my presence with my dad. They
20 said if I am there then my dad will heal quicker. However, three nurses refused to allow me to be
21 with my dad while they were his attending nurses. My dad unexplainably went into cardiac arrest
22 and his health became worse while they were his nurses and would not allow me to be there.
Specifically, Nurse Lizbeth Hamilton, Nurse Laree Lindgren and Nurse Sugette Molino (sp).

23 I also tried talking to Nurse Todd Isball about my father's treatment and negative experience
24 with the nurses and hospital staff and try to get this resolved once and for all. Todd told me he is
25 the chief nurse in charge of all the ICU(intensive care units). Todd told me that there is nobody
26 above him and he is the one to speak to about problems with nurses. I then told Todd that my father
would like to speak to him about the nurses and security and that my father and I would both like
different nurses.

27 Todd then proceeded to tell me that he was busy doing something else and he does not have
28 time for my father or me. He ignored my father and my requests. I tried contacting Todd numerous

1 times, but all times he just ignored me and told me that he is busy doing other things. I walked over
2 to his office that is near ICU to make the requests, but he told me to leave his office and shut the
3 door behind me and that he does not have time. On one occasion, he commented to me by saying,
4 "Wow! It sounds complicated, I'm busy right now!". He refused to help my dad and he refused to
give my dad new nurses.

5 While I was kicked out, I tried calling the hospital multiple times to get the status of my
6 fathers health. I was constantly hung up on by the PBX operators who stated they were given orders
7 not to give me any information about my father. They kept either hanging up on me or transferring
me to security or Helen Voss's office, then Helen Voss's secretary Shelly hung up on me.

8 Mountain View security's electronic logs document my phone calls and my repeated
9 telephone call attempts and hospital visit attempts to be with my dad. Security is bragging inside
10 their electronic log files how I kept calling to check on the status of my dads health, and how they
hung up on me and how they placed me in handcuffs and had me arrested for trespassing.

11 I kept trying and eventually did get through to ICU to request a status of my fathers health
12 after security kicked me out of the hospital, however, the Intensive Care Unit (ICU) kept hanging
13 up on me and telling me they had orders not to give me any information. My dad was in that
14 hospital, they would not allow my dad to see me or me to see my dad or tell me if my dad was ok
or not. They placed my dad in arm restraints so he could not move. He told them that he wanted to
check himself out and they would not allow him to do so.

15 My dad was in the hospital without me because the security guards would not allow me to
16 be there. My dad was expecting me to be there. They hurt my dad. On March 17, 2008, within
17 hours of security guards kicking me out of the hospital again, my dad unexplainably had a heart
attack.

18 They did something to hurt my dad by forcing him to have a heart attack within hours of
19 them placing handcuffs on me, beating me up while in handcuffs, and assaulting me. My dad was
20 fighting for his life while watching security and nurses harass his daughter at the same time while
21 he was fighting for his life and recovering from open heart surgery, then within hours of the battery
and while I was kicked out of the hospital, my dad unexplainably went into cardiac arrest.

22 My brother Steve said the attending nurse at the time of the cardiac arrest, Nurse Lizbeth
23 Hamilton took out the cardiac arrest machine before my dad went into cardiac arrest.

24 The hospital never told me that my dad had a heart attack within hours of them kicking me
25 out of the hospital. They refused to give me any information on my fathers health.

26 Security continued to harass me for the next three days every time I entered the hospital to
27 be with my dad. They followed me to my fathers Intensive Care Unit (ICU) as soon as I entered the
28 building. They waited for me to show up. Their own security guard electronic logs discuss how they
were waited for me every day so they can arrest me if I show up. Their actions were electronically

1 logged by themselves. They were bragging about kicking me out of my fathers hospital room inside
2 their own log files.

3 The hospital had 24 hour visiting. I tried to avoid confrontation with the security guards. I
4 was afraid of the security. They threatened to arrest me, they harassed me, they yelled at me. I even
5 confided in the security guards thinking that he would be understanding and help me. I told him that
6 my dad needs help and the nurses are hurting my dad. He then said in a sarcastic voice while raising
7 his voice and said, if somebody is hurting your dad up there, then you better go get help. He made
8 fun of me and my dad. He refused to help us.

9 Security guard's own electronic security logs state that they were waiting for me to show up
10 daily so they can kick me out without probable cause and attempt to have me arrested.

11 They did not allow me to be at my dad's bedside so that my dad could recover quickly and
12 feel loved. They would not allow me to be in my dads hospital room so that my dad felt loved by
13 his children and knew his daughter loved him and wanted him to recover and get better and come
14 home. They would not allow me to be there. My dad asked the nurse named Gi-Gi where I was
15 when I was kicked out for several days.

16 March 21, 2008, security forced me out of my fathers ICU room.

17 The hospital also never told me that my dad passed away. They kept it a secret from me, even
18 though I was listed in his medical admittance records as his main contact person and we lived
19 together and I was his only daughter. The doctors and nurses all kept my fathers death a secret from
20 me. I called on March 23, 2008 to check on the status of my fathers health, and the charge nurse
21 hung up the phone on me in ICU and stated that she is not allowed to give information about my
22 dad. I told her, "but that's my dad and I want to know if he is ok, can you please just tell me if he
23 is ok?" The charge nurse didn't care, and she said no and then hung up the phone on me.

24 Nurse Jane Theisen took my father off life support knowing I could not be there to stop her.
25 She did not have written consent. Nurse Lizbeth put my father in arm restraints so he could not
26 move.

27 Nurse Lizbeth Hamilton also stated to me, my brother Steve, and my mother that my dad is
28 not going to live long while telling us the symptoms he will have in a few days.

29 My dad was miraculously recovering when Nurse Lizbeth was not his nurse and other nurses
30 treated him. Several nurses said that my dad is going to be ok and he will be coming home soon and
31 the medical records show he is healing. On March 20, 2008, Nurse Leoni Deguzman, my dads
32 attending nurse on that day, said to me nicely, "Come here, I want to show you something." She
33 then walked me over to her computer screen and started explaining the numbers to me and pointing
34 at them. She said it's a miracle how the numbers are improving. She said she has never seen
35 anybody heal in 24 hours as quickly as my dad. That same night, I spent the night at the hospital
36 inside my dad's ICU room on a chair. I was talking to my dad, and he was getting better knowing

1 that I was there with him. This was the day before they arrested me and kicked me out of the
2 hospital. Then the next day on March 21, 2008, security guards kicked me out and arrested me. My
dad was getting better when I was there and he worsened when they kicked me out.

3 Nurse Alice Perrot said that my dad's health makes no sense because he was progressing
4 when she was his nurse.

5 Nurse Lizbeth Hamilton's nursing notes are edited with half page of white space where she
6 deleted comments. She was the nurse that caused all the problems and refused to allow me to be
7 in my dad's ICU room while she was his nurse. I asked Chief of ICU Todd Isball and Helen Voss
to have Nurse Lizbeth Replaced, but they refused.

8 Medical records show Nurse Lizbeth gave him succylochine and morphine even after she was
9 instructed not to give my dad any more morphine. Nurse Lizbeth yelled at all of us and stated for
10 us not to talk to my dad and not to look at the heart meter. She yelled at the top of her lungs at us
11 in front of my dad while he was fighting for his life with a breathing tube down his throat on life
support.

12 Nurse Lizbeth also would not allow me to be with my dad in his room while she was his
13 nurse. She was the attending nurse at the time my father unexplainably had a heart attack within
14 hours of security kicking me out and handcuffing me on March 17, 2008.

15 Dr. Rebecca Sinai commented out loud stating that my dad doesn't want to die, he keeps on
16 living. This comment is in addition to her statement she was recorded saying that she wanted to take
17 my dad off life support when he was in the next room resting on sleeping pills. The other doctor
took off the liquid sleeping pills hours later and my dad woke up and sat up in his hospital bed.

18 **INTERROGATORY NO. 3:**

19 State with particularity, in your own words, and without legal conclusion what injuries,
20 disabilities, damages, and/or losses you contend were incurred solely by reason of the alleged
21 actions of Defendants Mountain View Hospital and/or its staff, Neal Millot and Christopher Simms.

22 **ANSWER TO INTERROGATORY NO. 3:**

23 My Father lost his life due to Mountain View hospital. I suffered the loss of my dad due to
24 Mountain View hospital. My dad is gone forever because of Defendants Mountain View Hospital
25 and its staff, Neal Millot and Christopher Simms. These damages are permanent.

26 Mountain View security guards handcuffed me, beat me up, assaulted me, battered me,
27 emotionally and mentally abused me, and precluded me from spending anytime with my Dad prior
28 to Mountain View terminating his life.

1 They physically and mentally tortured my dad and me both. They refused to tell me the status
2 of my fathers health during the three weeks he was a patient at Mountain View hospital.
3

4 My father lost his life so he is not here to speak for himself. They illegally detained my dad
5 by forcing arm restraints on his wrists so he could not move. Nurses saw the arm restraints that
6 Nurse Lizbeth Hamilton placed on my dad, and I took pictures of these arm restraints.
7

8 My dad told them he wanted to come home and he asked nurse Gi-Gi where his daughter was
9 after they kicked me out. Verbally and mentally assaulted and emotionally abused his children and
10 their mother, in front of him while he had a breathing tube down his throat and fighting for his life
11 and restrained to the Intensive care unit hospital bed. Then hospital security guards handcuffed me,
12 made several police 911 calls requesting that I be arrested for visiting my dad. March 23, 2008,
13 they took my dad off life support while they made sure I was not there to stop them. If I were there,
14 and if they never arrested me, and if security never handcuffed me and took me away from my dad,
15 then my dad would still be alive and living a healthy happy life with his three children.
16

17 Mountain View security guards Neal Millot, Christopher Simms and Maurice Daveu battered
18 me and handcuffed me with my hands behind my back. They forced me out of the hospital building
19 and into the parking lot and threatened me and harassed me. Maurice Daveu chased me into the
20 parking and into the middle of the street Tenaya in front of Mountain View hospital while I was
21 running away from him.
22

23 I was sitting on the bus bench in front of Mountain View waiting for him to leave so I could
24 enter the hospital parking lot so I could get into my truck and drive home. Maurice said if I come
25 back onto the hospital property, then he will handcuff and arrest me. So I was waiting for him to
26 go away and back inside the hospital so I could drive away. He stood in the parking lot staring me
27 down while I was sitting on the bus stop bench. He kept waiting and would not leave and go back
28 inside. He kept talking to somebody on his walkie talkie every minute or so. He then started coming
toward me, I stood up from the bus stop bench in front of the hospital and started running from him
in the middle of Tenaya. He said that his boss told him that the hospital owns the bus stop property
and the street in front of the hospital. I ran from him thinking that the hospital does not own the
other side of the street, so I started running across the street.
29

30 Security guard Maurice grabbed me in the middle of Tenaya and placed handcuffs on me
31 while in the middle of Tenaya and dragged me back onto the hospital parking lot with handcuffs
32 behind my back. He then battered me by pulling and forcing my arms up toward my head while his
33 Chief of security Christopher Simms watched. Metro police officers came and witnessed this
34 handcuff incident. The police officer saw the handcuffs behind my back.
35

36 Police 911 recorded calls, police logs of 911 calls, Mountain View hospital's own electronic
37 security guard logs, all confess to placing me in handcuffs. Security guards are bragging inside their
38 own logs and confessing to placing me in handcuffs and how they kicked me out of the hospital
39 while my dad was a patient in the hospital. They would not allow me to be with my dad. They were
40 very heartless. I even pleaded with them for help with my dad. I thought they would do the right
41 thing.
42

1 thing and help me and stop harassing me, and help my dad because they were security guards and
2 their job is to help people, but instead, they physically hurt me, handcuffed me, assaulted me, falsely
3 imprisoned me, falsely detained me, and participated in malicious prosecution as they helped and
4 initiated the false arrest on March 21, 2008; I could not be there because I was in jail and kicked
5 out of the hospital and my father was taken off of life support.

6 I was physically forced to sit on the parking lot while Mountain View security guards
7 mentally and physically abused me. Maurice Daveu pushed me down to the ground. He would not
8 allow me to stand up.

9 I sustained life long severe emotional, psychological and physical injuries, mental pain and
10 suffering and emotional distress that I will live with forever. My dad is gone forever and it is their
11 fault.

12 Doctors and nurses were in violation of NRS 449.626. They never had written consent to
13 take my dad off life support, and this statute states they need that permission and if they don't have
14 written permission.

15 These horrible events are a part of my memory and will stay in my memory for the rest of my
16 life. I was traumatized because they wouldn't allow me to be with my dad at his bedside while he
17 was fighting for his life; and my dad was traumatized by hospital staff as the security guards Neal
18 Millot, Christopher Simms and Maurice Daveu along with Nurse Jane Theisen and Nurse Lizbeth
19 Hamilton and several other staff members and doctors, specifically Dr. Rebecca Sinai Smith D.O
20 and Dr. Timothy Hamilton that performed the coronary bypass surgery.

21 The other doctors along with Dr. Timothy Hamilton and the nurses refused to speak to me
22 concerning my fathers health and keep me updated.

23 The doctors' notes state that they had plans to take my father off life support, however, they
24 never discussed this with me or any of my brothers; my fathers children. They made the decision
25 on their own to take my dad off life support. They are in violation of NRS 449.626. They never
26 gave my dad a chance to recover from the surgery. Ten days is not long enough to recover from
27 open heart surgery. They kicked me out of the hospital, then they took my dad off life support so
28 I could not be there to stop them.

29 During a family meeting on March 2, 2008, Dr. Michael Codina advised me and my two
30 brothers that my father was progressing. He took advantage of our weak moment in life knowing
31 that we would believe anything he says because we are not doctors and we want to believe anything
32 that a doctor says that is positive.

33 He told all of us that the coronary bypass surgery will make my dad better than before. The
34 doctor told us he was a good candidate simply because my dad did not smoke. Dr. Codina was not
35 my dad's doctor but he was forced to have the meeting because the doctor that put in the pacemaker
36 disappeared from being my dad's doctor after the pacemaker complications and realizing that he
37 never did any tests and he placed a pacemaker in my dad without him needing one. Dr. Erik

1 Sirulnick was suppose to discuss my dad's health with us, but he never showed his face again, and
2 Dr. Timothy Hamilton, the cardiac surgeon never had a meeting with us to discuss the procedure
prior to the coronary bypass surgery.

3 I tried asking Timothy Hamilton questions concerning my father's health when I saw him in
4 the hallway, and he refused to answer me. He just stood there and looked at me and refused to talk.
5 He would not discuss my father's health with me.

6 My fathers medical records state that my dad was not a good candidate for open heart surgery
7 and another Cardiologist listed in my fathers medical records by the name of Jeannette Nee, said
not to get the coronary bypass done and that my father is not a good candidate for open heart
8 surgery. Dr. Nee was my fathers attending physician for one operation after the botched pacemaker.
9 She also disappeared from being my dad's doctor. Her doctor notes recommend to the other doctors
not to get the surgery, but they ignored her notes and did the surgery knowing my father would not
10 make it out of the surgery based on her recommendation. She also disappeared from being my dad's
doctor and allowed the surgery to happen knowing my dad was a high risk patient and he was not
11 strong enough due to the multiple surgeries that came before since he entered the hospital;
pacemaker, angioplasty, and other procedures. He needed time to heal from these other surgeries.

12 The doctors notes and high risk information inside the medical records was not made
13 available to me until after the death of my father. Nurses and Mountain view hospital medical
14 records department refused to release my fathers medical records to him while he was a patient in
the hospital. We tried to get the records before the coronary bypass surgery. The charge nurse
15 refused to help us get them. She said "no".

16 The medical records state that there is a negative zero percent (0) chance that my dad would
17 make it out of surgery.

18 I lived with my dad for 40 years and my dad expected his daughter to be there with him. I
19 wanted him to know that I love him and I want him to get better. But the security guards and several
20 nurses would not allow me to be with my dad. I was minding my own business inside my dad's ICU
room, when security came into my dad's ICU room and started harassing me and bullying me in
21 front of my dad while he was recovering from surgery and on life support. These emotional mental
injuries are permanent. I remember it and I will always remember it. They will never go away.
22 Trauma never heals and my dad is gone forever. They took my dad off life support. This is
permanent.

23 Nurse Jan Theisen lied in her nurse notes and said the whole family was there, however, I
24 was not there. She simply lied, then took my dad off life support. NRS 449.626 states the hospital
25 MUST have the patient or the patients children's written consent to take the patient off life support.
Security guards helped the hospital.

26 **INTERROGATORY NO. 4:**
27

28 If you contend that Mountain View Hospital was negligent and careless in the performance

1 of its duties and obligations owed to you, state with specificity, in your own words, and without
2 legal conclusion, all facts upon which you rely.

3 **ANSWER TO INTERROGATORY NO. 4:**

4
5 Mountain View failed to care for my father while he was a patient at the hospital. Part of the
6 care he is to be provided is standing orders on visitation rights. Mountain View had 24 hour visiting
7 hours. They refused to allow me to visit my dad. They physically assaulted me and committed
battery on me, then kicked me out of the hospital and forbid me from being with my dad while he
was recovering from surgery.

8
9 On 3/23/08, Nurses (nurse Jane Theisen) took my dad off his life sustaining treatment
10 without my dad's written consent, without my written consent, and without any written consent at
11 all. Within hours of Nurse Jane Theisen withholding treatment and taking my dad off his life
12 support, he passed away. Her nurses notes state that she simply removed him from his life support,
then called the doctor and told him what she just did by removing his life support, then she clocked
out to go home.

13
14 **NRS 449.626 states written consent must be obtained from the children or patient
prior to withholding life support and life sustaining treatment, and if no written
consent is given.**

15
16 Nurse Jane Theisens admits in her nursing notes that she withheld my dads life support from
17 him and the doctors refused to treat my dad and give him medical attention after she called them
18 and told them that she removed his support. The doctors withheld all further treatment. Their
doctors notes state that they were planning on removing my dad from life support. They never
discussed this with me or my brothers.

19
20 Doctors and nurses took my dad off life support without me being there to stop them as I
21 would NEVER allow this to happen. My father wanted to live and gave written instructions to the
hospital during admittance to keep him alive.

22
23 Hospital security kicked me out of the hospital so nurses and doctors could take my father
24 off life support without me being there. Hospital security guards electronic notes admit to them
kicking me out and not allowing me inside the hospital when my father died. They admitted to
harassing me inside their own security log files. They were bragging about handcuffing me and
harassing me. They bragged about how they finally accomplished getting me arrested.

25
26 911 calls were made by myself from inside the hospital when security was forcing me out
27 of the hospital for trespassing and forbid me to be with my dad while harassing me and following
28 me throughout the hospital. They told me to leave the hospital, but they wouldn't let me leave the
hospital. They kept following me throughout the hospital, into the elevators. They entered my
fathers ICU room and harassed and threatened me. I was kicked out of the hospital and forbidden

1 to be with my father while doctors and nurses took my dad off life support.

2 The doctors, nurses or any other hospital staff never notified me of my fathers death or why
3 he passed away. They hid it and kept it a secret from me. To this day, they never told me. I only
4 found out how my father passed away "after" reading the nurses notes inside my fathers medical
5 records which nurse Jane Theisen admits to taking him off life support without my written consent
or my fathers written consent.

6 I am my fathers only daughter and my father and I lived together. I lived with my father my
7 entire life. My father signed hospital paperwork during admittance that I am his only daughter and
8 main contact person. I lived with my father over 40 years, and therefore, I knew my fathers health
9 better than anybody and if any questions needed to be answered concerning my fathers health, my
father instructed the hospital staff to come to me for answers. However, the hospital ignored my
fathers request and refused to discuss my father's request.

10 My father also signed hospital paperwork stating that he does not have a living will and that
11 he does not want a living will and for the hospital to do everything possible to keep him alive during
12 surgeries and post surgeries. But nurse Jane Theisen and the doctors ignored my fathers written
13 request to the hospital to keep him alive and they withheld medical treatment and his life sustaining
14 treatment causing my dad to pass away without the medical treatment and doctors care. Specifically,
Dr. Rebecca Sinai, nurse Jane Theisen, and hospital staff.

15 My father was in the hospital for a total of three weeks. He was on life support for only one
16 week before the nurses and doctors took my father off life support. They did not give him a chance
17 to get better. He was recovering from coronary bypass surgery and multiple other surgeries
18 including a pacemaker surgery that was placed inside my father without blood tests done or
19 notifying my fathers primary physician Dr. Leon Rosky, D.O. to determine whether he needed a
pacemaker or not. In addition, these operations take longer than one week for a patient to recover.
These are serious operations that take time to heal. They never gave him chance to recover. They
did surgery after surgery, then charged the insurance companies \$600,000.00

20 They never gave my dad a chance to heal and come home, and they would not allow me to
21 be with my dad while he was recovering. They wouldn't allow me to be with my dad so I could tell
22 my dad that I loved him. I wanted him to know his daughter loved him and that I was there with him
23 in the hospital. Mountain View security guards and staff would not allow me. The security guards
forced me out of the hospital in handcuffs.

24 The hospital was very mentally cruel to both my father and me while he was a patient inside
25 Mountain View hospital for three weeks. However, he was more like a prisoner and not a patient
26 because the nurse (Lizbeth Hamilton) put arm restraints on his arm so he could not move. The nurse
27 named Gi Gi told me that my dad was asking her where I was when the first time that security
started kicking me out of the hospital. My dad was use to me being there and when he didn't see
me there, he worried. The hospital caused my dad to worry.

28

1 They would not allow my dad to heal from each prior surgery before starting the next
2 surgery. My dad told him that he wanted to check himself out and go home. The hospital liaison,
3 doctors and nurses refused to listen to my dad. They forced him to stay in the hospital against his
will.

4 After the surgery's, Dr. Rebecca Sinai Smith D.O., commented to me and several other
5 family members, that my dad doesn't want to die and he keeps living and breathing. My dad signed
6 his signature upon entering the hospital stating that he does not have a living will and the hospital
7 is instructed to do everything possible to keep my dad alive. I specifically told Dr. Rebecca Sinai
that my dad is not a DNR patient and he gave orders to keep him alive. Dr. Rebecca ignored my
dad's wishes.

8 **INTERROGATORY NO. 5:**

9
10 If you contend Mountain View Hospital, its agents, servants, and/or employees made any
11 statements which constitute an admission with reference to any of the issues raised in this case, state
12 the name or identity of the person making such statements, the content of such statements, the date,
13 the time, the place of such statements, and the names and addresses of the individuals who heard
14 such statements.

15
16 **ANSWER TO INTERROGATORY NO. 5:**

17 March 2, 2008 – during a meeting, Dr. Rebecca Sinai stated that she wanted to take my
18 father off life support when he was sleeping on sleeping pills. She said my dad was a “Do Not
19 Resuscitate patient”. She was incorrect. My dad signed hospital paperwork prior to surgery that he
20 is not a DNR patient and he does not have a living will and he does not want a living will and the
21 hospital is instructed to do everything possible to keep my dad alive. He was recovering from the
pacemaker complications. Within hours, the other doctor took my father off the sleeping pills, and
he woke up, and he was sitting up in the hospital bed and alert. (Dr. Sinai was recorded saying this)

22 Mountain View hospital staff conspired along with the security guards to take my father off
23 life support. Security handcuffed me and kicked me out of the hospital and on several occasions
24 made 911 police calls requesting to the police that I be arrested. Mountain View hospital security
25 guards are bragging in their security guard log files about placing me in handcuffs and kicking me
out while forbidding me to be with my dad. Security also discusses in their own security guard logs
26 how they waited daily for me to show up and visit my dad so they can kick me out.

27 While I was in jail and forbidden to be with my father by Mountain View hospital, the
28 hospital took him off life support. NRS 449.626 states that written permission must be given by the
patient or the patients children if the patient is incapacitated prior to withholding life sustaining

1 treatment. The hospital did not have my fathers written permission nor my written permission nor
2 any written permission from any of my fathers three children. My father was incapacitated and
3 unable to speak for himself. The hospital had him sleeping in a drug induced sleep while fighting
for his life.

4 Furthermore, my father gave specific written orders inside his medical records to the
5 hospital to do everything they can to keep him alive. They ignored my fathers paperwork.

6 **INTERROGATORY NO. 6:**

7 Please itemize by date any and all of your damages (including legal fines/expenses, medical
8 expenses, bills or other expenses incurred to date) which you contend arose as a result of the alleged
9 incident, and if you are seeking to recover, and if the damages, bills and/or expenses have been
10 paid, state the amount paid and identify by whom or what entity the payments were made.
11

12 **ANSWER TO INTERROGATORY NO. 6:**

13 My damages are irreversible. My dad is gone forever. You refused to allow my dad to grow
14 old naturally. You refused to allow my dad to be with his daughter the last days of his life. You
15 refused to allow me to tell my dad that I loved him while he was in the hospital and the last days
16 of his life. My father is deceased and gone forever. There is no recovery. The damage is permanent.

17 **INTERROGATORY NO. 7:**

18 If you contend that Mountain View Hospital failed to properly account for visitor, employee
19 and patient safety in any manner, state with specificity, in your own words, and without legal
20 conclusion, all facts upon which you rely.

22 **ANSWER TO INTERROGATORY NO. 7:**

23 Mountain View hospital staff took my father's life by taking him off life support after
24 kicking me out of the hospital so I could not be there to stop them. My father was expecting medical
25 treatment while he was a patient at the hospital. They refused medial treatment, took him off life
26 support, then let him die. NRS 449.626 states that written permission must be given by the patient
27 prior to withholding life sustaining treatment. They did not have my fathers written permission, nor
28 my written permission. Hospital security guards Neal Millot and Chief of security Christopher
Simms along with Dr. Rebecca Sinai. They kicked me out of the hospital, then took him off life
support.

1 **INTERROGATORY NO. 8:**

2 If you contend that you suffer emotional damage and both physical and financial hardship
3 as a result of the alleged incident averred to in your Complaint, please state in your own words in
4 detail and without legal conclusion, a description of those emotional damages, and both physical
5 and financial hardships, and how the same affect and/or limit your activities and lifestyle.

6
7 **ANSWER TO INTERROGATORY NO. 8:**

8 My life is shattered because of Mountain View hospital. My emotional damages cannot be
9 described as you are requesting. They are irreversible. My dad is gone forever. Nurse Jane Theisen
10 and security guards Chief Christopher Simms and Neal Millot conspired with hospital staff to go
11 along with taking my dad off life support.

12 They refused to allow my dad to grow old naturally. They refused to allow my dad to be
13 with his daughter the last days of his life. They refused to allow me to tell my dad that I loved him
14 while he was in the hospital and fighting for his life. There is no recovery for me or my dad and
15 there is no financial amount that can be placed on this. My father is deceased and gone forever
16 because Mountain View hospital took him off life support. Every day of my life and for the rest of
17 my life I think about and I will continue to think about what Mountain View hospital did to my dad
18 the short three weeks he was a patient there.

19 Every day I think about how Mountain View, their security guards Christopher Simms, Neal
20 Millot and Maruice Daveu, nurses, doctors and treated my father and family.

21 My dad was my best friend. My life is empty since my dad's death. I have to live without
22 my dad, my best friend. They refused to allow him to grow old naturally. My dad's life was taken
23 against his will by Mountain View hospital.

24
25 **INTERROGATORY NO. 9:**

26 State the name, address, and telephone number of each individual who witnessed the incident
27 or the events occurring immediately before or after the incident, who made any statement at the scene,
28 and who you or anyone acting on your behalf claim has knowledge of the incident.

29
30 **ANSWER TO INTERROGATORY NO. 9:**

31 The police reports, 911 Police recordings and logs, Mountain View security guard written log
32 files, March 21, 2008 arrest along with the March 17, 2008 handcuff incident by Mountain View

1 security guards, doctors notes, nurses notes, and my father's death all speak for itself.

2 The doctors that committed the crimes are inside the medical records, and the hospital security
3 guards are listed as Defendants on this lawsuit, and I don't know their addresses and telephone
4 numbers. They were working under the jurisdiction of Mountain View hospital at the time of the
assault and battery and my father's death.

5 Mountain View hospital security guards admit in their own written logs and to the police
6 through the 911 calls that they handcuffed me. Nurses and doctors admit and discuss taking my father
7 off life support in their very own doctors and nurses notes. They followed through while colluding,
conspiring, and assisting each other with their plans to have me falsely arrested for trespassing, then
8 my father died while I was arrested and jailed so I could not be there to stop them.

9 **INTERROGATORY NO. 10:**

10 Please state in your own words in detail and without legal conclusion, all the facts which you
11 contend confirm, evidence, support, or otherwise relate to your claim for Assault and Battery against
12 Mountain View Hospital, Neal Millot and Christopher Simms as alleged in your Amended Complaint.

14 **ANSWER TO INTERROGATORY NO. 10:**

15 March 2, 2008; Starting the day after my father was admitted into Mountain View hospital and
16 after complications concerning the pacemaker surgery; hospital security guards and certain staff
members started harassing me when I visited my father.

18 March 2, 2008, the day after the pacemaker complications, Mountain View security guard,
19 Neal Millot, stated to me that he was going to have me arrested. My father almost died the day before
and was fighting for his life in the next ICU room over while hospital security guards were threatening
20 and intimidating me and verbally assaulting me.

21 Chief nurse, Helen Voss ordered me out of the hospital after I came to her for help. I was
22 crying and asking for her help because security would not allow me to be with my dad. Instead of chief
23 nurse Helen Voss helping me, she called security on me and had me kicked out of the hospital. My
24 mother called Helen Voss several times to speak to her and find out why she kicked me out of the
hospital. Nurse Voss refused to return my mothers phone call. My brothers also talked to the charge
25 nurse to allow me to visit my dad. The nurse discusses the conversation with my brothers inside her
nurses notes.

26 March 17, 2008, Mountain View security guards committed assault and battery on me by
27 following me throughout the hospital and into the elevator and running after me into the middle of
Tenaya in front of the hospital, and then handcuffing me and physically forcing me to the ground and
28 physically pulling my arms that were in handcuffs behind my back up toward my head. The handcuffs

1 caused bruises on my wrists. I told the Chief of Security Christopher Simms that if he doesn't take
2 these handcuffs off me and let me see my dad, then I'm going to sue you. Simms became angry at my
3 comment and then started yelling at me with the handcuffs still behind my back, stating, "WHAT
4 ARE YOU GOING TO SUE ME FOR JOYCE? HUH? HUH? WHAT ARE YOU GOING TO SUE
5 ME FOR? TELL ME!! HUH? TELL US, TELL US!" Maurice then started pulling the handcuffs up
6 toward my head harder. I didn't answer him.

7 Metro police then arrived at the scene. Metro police and the 911 call is my evidence. Metro
8 police saw me with the handcuffs locked behind my back. I was upset and crying. I told the police
9 officer that my dad is in the hospital and I'm here visiting him and they won't allow me to visit my
10 dad. I told him that I think my arm is broken and it hurts..

11 On several occasions I was verbally assaulted and yelled at by hospital nurses. Nurse Lizbeth
12 Hamilton yelled at me, my mother, and my brother all at the same time when we were visiting my
13 father. She also refused to allow me to be with my dad when she was his nurse.

14 March 17, 2008, within hours of the hospital security guards kicking me out of the hospital,
15 my dad unexplainably had a heart attack while in the care of nurse Lizbeth Hamilton. My dad
16 appeared to get better when other nurses tended to him other than nurse Lizbeth Hamilton. She also
17 put arm restraints on my dad without doctors orders or permission. I have pictures of the arm restraints
18 on my father as evidence.

19 Mountain View security guards Chief Christopher Simms and his subordinates kept harassing
20 me and verbally assaulting and threatening me. The verbal assaults, threats and intimidation continued
21 throughout my fathers three weeks that he was in the hospital, until March 23, 2008, the day my dad
22 died.

23 Mountain View security guards unlawfully handcuffed me against my will, and placed me
24 under arrest when they did not observe me doing anything wrong. Placing me in handcuffs constitutes
25 battery. While I was in handcuffs, they threatened me, and told me they were going to have me
26 arrested. They simply handcuffed me to prove that they could.

INTERROGATORY NO. 11:

27 Please state in your own words in detail and without legal conclusion, all the facts which
28 relate to "defendant security officers and nursing staff to confine, attempt to arrest and harass on at
least two prior occasions", as stated in Paragraph 52 of your Amended Complaint.

ANSWER TO INTERROGATORY NO. 11:

27 March 2, 2008, security guards and nurses started the onset of the harassment.

1 March 9, 2008, the day before the open heart surgery, Nurse Shelley Guarnera was my fathers
2 nurse the day before his operation. She was threatening my father and me within my fathers ICU
3 hospital room and yelling at us both saying that I better do what she says and my father is going to get
4 the operation even if he can't breathe and whether he wants it or not, and she does not care what the
5 doctors notes say. She admits to this conversation in her nurses notes, with different wording. I tried
6 talking to the Charge nurse Liz about nurse Shelley Guarnera, but she ignored both my father and me.
7 She didn't care what we had to say. Nurse Shelly Guarnera admits to this conversation inside her
8 nurses notes dated March 9, 2008.

9 March 10, 2008, my dad had open heart surgery. Prior to the coronary bypass operation on
10 3/10/08, my father could not breathe and was short of breath. The pulmonary doctor put this in his
11 notes and also said that my father should have extensive lung testing due to his lung condition.

12 The nurses ignored the doctors orders to get my fathers lungs tested prior to surgery and
13 dressed my father for surgery regardless of what the other doctor wrote knowing that my father could
14 not breathe. Another nurse also put in her notes that my father failed the breathing test right before
15 surgery. It is also documented inside my fathers medical records that my father's platelets were too
16 low to have the surgery and he was too weak.

17 March 11, 2008, security guards and Chief nurse Helen Voss physically kicked me out of the
18 hospital and refused to allow me to be with my dad. I went to Helen Voss for help after the nurses and
19 security kept harassing me and refused to give me a status update on my fathers health. Instead of
20 Chief Nurse Helen Voss helping, she conspired with security and kicked me out. My mother tried
calling the nurse to request that I be allowed back into the hospital and to find out why I was kicked
out. Nurse Helen Voss never returned my mothers calls.

21 March 17, 2008, security guards kicked me out of the hospital, assaulted me, battered me and
22 placed me under arrest by handcuffing me with my arms behind my back, causing bruising on my
23 wrists and bruised arm sockets as security guard Maurice pulled my arms up toward my head while
24 they were handcuffed behind my back, and Chief of security Christopher Simms watched. They were
yelling, threatening and intimidating me while telling me I'm going to go to jail.

25 Security guard Maurice Daveu committed assault and battery and false imprisonment and false
26 arrest on me when he chased me into the middle of Tenaya road in front of Mountain View hospital,
27 and off Mountain View hospital property, then placed handcuffs on me in the middle of the street in
28 front of cars driving by, then dragged me back into Mountain View parking lot and forced me to the
ground by pushing me down. The police arrived and saw me in handcuffs.

29 As a result, I was deprived of my liberty, as they placed me in handcuffs causing me to not be
able to move freely. Within a few hours of Mountain View security placing me under arrest by placing
me in handcuffs and assaulting me, my father went into cardiac arrest while in the care of Nurse
Lizbeth Hamilton, the same nurse that yelled at me, my mother and brother in front of my father, and
the same nurse that would not allow me to be with my father while she was my fathers attending
nurse.

1 Nurse Lizbeth Hamilton is the same nurse that I requested to Todd Isball the Chief of ICU that
2 I did not want her as my father's nurse and I requested a new nurse. In addition to requesting this to
3 Chief Nurse Todd Isball, I also requested this to Chief Nurse Helen Voss. Instead, they kicked me out
4 of the hospital instead of honoring my request, then my dad went into cardiac arrest while I was not
there.

5 Nurse Lizbeth Hamilton also placed my father in arm restraints and would not allow him to
6 see his daughter while he was a patient in the hospital. They would not allow my dad to check himself
7 out of the hospital. He tried to leave. They shoved a breathing tube down his throat and kicked out his
daughter when he tried to check himself out of the hospital to go home. He requested to go home and
they wouldn't let him.

8 March 21, 2008, Mountain View security guards assaulted and held me when they cornered
9 me into the elevator and followed me throughout the hospital, not allowing me to leave. I called 911
10 from inside my fathers hospital ICU room and requested help from the police because the security
11 guards were harassing me. I'm the one that requested help from the police, and instead of the police
helping me, I was arrested on a citizen's arrest.

12 Security guards wrote about the arrest and handcuff incidents in their own log files. They are
13 bragging inside their own log files how they were responsible for having me arrested and how they
14 handcuffed me.

15 March 23, 2008, my father died when his life sustaining treatment was discontinued. Nurse
16 Jane Theisen lied inside her nurses notes stating that the whole family was there; However, I was not
17 there because I was arrested the night before and kicked out of the hospital and threatened that if I
return then I will be arrested again.

18 Nurse Jane Theisen knew I was not there because she was the attending nurse that was inside
19 my fathers ICU room the night of the March 21, 2008 arrest along with the security guards and police
20 inside my dad's ICU room. Security guards barged into my fathers ICU room and forced me out of
the his room while yelling at me in front of my dad and while my dad was recovering from open heart
21 surgery. My dad needed his rest, but the security guards and police along with Nurse Jane Theisen did
not care. Nurse Jane Theisen wanted to get me out of my fathers ICU room so she could take him off
22 life support.

23 **INTERROGATORY NO. 12:**

24 Please state in your own words in detail and without legal conclusion, all the facts which you
25 contend confirm, evidence, support, or otherwise relate to your claim for Civil Conspiracy against
26 Mountain View Hospital, Neal Millot and Christopher Simms as alleged in your Amended Complaint.

27 ///

1 **ANSWER TO INTERROGATORY NO. 12:**

2 Mountain View hospital and staff members engaged in a joint venture to harass me and commit
3 assault and battery on me, by illegally detaining me and placing me in handcuffs, while intentionally
4 inflicting emotional distress upon me. They conspired and colluded to have me arrested. Hospital
5 security admits to their conspiracy inside their own security log files. Hospital security stated that they
6 waited for me daily to enter the hospital so they could harass me and attempt to have me arrested.
7 They would not allow me to be with my dad while he was recovering from open heart surgery. They
8 harassed me, assault and battered me, falsely imprisoned, falsely arrested, and falsely detained me, and
9 then they took my dad off life support and he died.

10 They planned and conspired together. Nurse Jane Theisen conspired along with security guards
11 and doctors to remove my dad from his life support after I was arrested, so I could not be there to stop
12 her. She stated in her nurses notes that the whole family was there, however, I was not there, and she
13 knew I was not there because she was the attending nurse the day of the arrest. Doctors also mention
14 their intent to remove my dad from life support inside their doctors notes without ever telling my
15 father's children what they have done. The hospital security and defendants, nurses, staff and others,
16 secretly conspired and agreed together to let dad die by taking him off life support without his
17 childrens' knowledge. The hospital never told me that my father passed away. They forbid his
18 daughter from seeing him and I was not there at the time of his death.

19 **INTERROGATORY NO.13:**

20 Please state in your own words in detail and without legal conclusion, all the facts which you
21 contend confirm, evidence, support, or otherwise relate to your claim for Negligence, Negligent
22 Hiring, Training, and Supervision against Mountain View Hospital, Neal Millot and Christopher
23 Simms as alleged in your Amended Complaint.

24 **ANSWER TO INTERROGATORY NO. 13:**

25 Mountain View hospital has 24 hour visiting. They would not allow me to visit my father while
26 he was in Intensive Care. They allowed strangers to enter my fathers ICU room. Specifically, Danielle
27 Pieper. Security kicked me out, handcuffed me, threatened me, assaulted me, committed battery on
28 me, and caused me to be arrested refusing treatment to my dad, causing my dad to lose his life while
he was a patient under the the care of Mountain View hospital.

Furthermore, in 2007, Dr. Timothy Hamilton, the surgeon that performed the coronary bypass
operation, had his license taken away in Texas for committing the felony of selling prescriptions of
the controlled substance clonazepam (xanax) to the friends of coworker nurses, people that were not
patients and he never seen. Mountain View hospital was aware that Dr. Timothy Hamilton committed
a felony and they still allowed him to be operate on patients knowing that he was a committed a felony

1 within the state of Nevada and Texas both. Nevada State board of Medical examiners found Timothy
2 Hamilton in violation of 630.301(3), and he was asked to surrender his medical license while under
3 investigation. However, Mountain View allowed him to operate on my dad knowing that he was under
4 investigation with the board for committing a medical felony. Mountain View hid this information
5 from my father and me.

6 When my dad was admitted into Mountain View hospital, we all expected the hospital to care
7 for him and my father expected them to allow his children to visit him during the 24 hour visitation
8 hours. Instead, they refused to care for my dad by taking him off life support without his written
9 consent so the written consent of his family.

10 Mountain View hospital laws say that they provide care for their patients and part of that care
11 provides for standing orders on visitation rights of patients and family members and that these rights
12 are protected. Mountain View breached this patient care and duty.

13 They put arm restraints on my dads wrists against his will forcing him to remain in the hospital
14 and receive operations against his will, they refused to allow him to leave after he requested to go
15 home. Instead of allowing him to go home, they committed assault and battery on his daughter,
16 threatened her, yelled at her, intimidated her, harassed her, placed her under arrest by placing her in
17 handcuffs, not allowing her to visit her dad while he was in the hospital, and participating in and
18 initiated a false arrest causing her to be arrested and spend the night in jail for 17 hours while her
19 father was in the hospital fighting for his life.

20 While I was arrested and in jail, Mountain View staff took my dad off life support, knowing
21 that I could not be there to stop them from doing so. If I were there to stop them, then my dad would
22 still be alive. If the doctors would have listened to me and my dad and allowed him to leave the
23 hospital and check himself out, then my dad would still be alive and living a healthy happy life with
24 his children.

25 NRS 449.626 states the hospital is not allowed to take a patient off his life sustaining treatment
26 without the patients written consent or the children's written consent. The hospital did not have my
27 dad's written consent or my written consent or any of his children's written consent.

28 **INTERROGATORY NO. 14:**

29 Please state in your own words in detail and without legal conclusion, all the facts which you
30 contend confirm, evidence, support, or otherwise relate to your claim for Malicious Prosecution
31 against Mountain View Hospital, Neal Millot and Christopher Simms as alleged in your Amended
32 Complaint.

33 ///

1 **ANSWER TO INTERROGATORY NO. 14:**

2 Mountain View Hospital, Neal Millot and Christopher Simms all took an active role in
3 participating and initiating and encouraging the arrest and harassment.

4 Mountain View had no probable cause to detain me, harass me and hold me against my will
5 on March 21, 2008. Security guards were bragging in their electronic log files that they had me
arrested for trespassing.

6 I was indeed arrested for battery on March 21, 2008, and Mountain View participated in
7 causing that arrest. Mountain View maliciously prosecuted, and falsely arrested me when they placed
8 me in handcuffs and held me against my will. They would not allow me to leave the building. They
9 assaulted me and called the police 911 operator on numerous occasions and requested to have me
arrested for trespassing, even though I was not trespassing at all, and I was only there to be with my
dad.

11 I was forced to answer to a criminal complaint in court that Mountain View participated in
12 initiating, thus causing the arrest while keeping me away from my dad the last day of his life.

13 Mountain View did not screen my father's visitors and they allowed strangers to enter my
14 father's hospital room while refusing to allow his own daughter to be with him; specifically, they
15 allowed Danielle Pieper to enter my father's hospital room without his permission, even though doctors
16 orders stated that only family members are allowed to enter my father's ICU room. My dad paid for
17 that room during his stay and he was expecting the hospital to give him the medical treatment he
needed and allow his children to be by his side bedside while he is recovering. Instead, they committed
18 assault and battery on his daughter, and forbid her to be by his side while he recovered, then they tortured
my dad, causing him extreme mental and physical pain, then they arrested me and I was not
present at this death.

19 They also tried to have me arrested for trespassing while I was visiting my dad. They barged
20 their way into my father's Intensive Care room and started talking loud while my dad was fighting for
21 his life and I was by his bedside. They forced me out of the room, causing my dad to go into cardiac
22 arrest on March 17, 2008, then causing my dad to die on March 21, 2008. My dad is gone forever
because of Mountain View hospital, their security guards and their staff.

23 Their trespassing charge was declined and abandoned by the police officer. The police arrested
24 me for battery instead they were planning and conspiring to accomplish for several weeks, according
25 to their own written electronic log files. The Defendant Played an Active Role in the Original Case
In a malicious prosecution suit and they had the thought in their mind of malicious prosecution.

26 They did not have probable cause to have me arrested for trespassing, since I was only at the
27 hospital with my dad while he was a patient in the intensive care unit. Furthermore, my dad and I lived
28 together for over 40 years and he gave specific hospital instructions to come to me for guidance on
his health. I was listed in my dad's medical records at Mountain View hospital as his main contact

1 person; I was the one most familiar with his health. They did not have probable cause to detain me and
2 arrest me. Security was being mentally cruel. They told the 911 operator that I was there visiting my
3 dad, therefore, they knew why I was there, and I had a right to be there, but they insisted to the 911
4 operator that I be arrested for trespassing. Mountain View hospital security, Neal Millot and
5 Christopher Simms instigated the arrest, they falsely accused me of trespassing with malice and hate
in their minds as they caused me to be arrested. Mountain View hospital security participated in
Malicious prosecution.

6 Mountain View hospital security guards, nurses and staff instigated or participated in the
7 prosecution by pressing police to apply for a complaint for the improper purpose of trespassing. I was
8 not trespassing if I was at my dying fathers bedside praying that he get better so he can come home.
They pulled me away from my dads bedside and arrested me, then the next day they took my dad off
life support.

9
10 **INTERROGATORY NO. 15:**

11 If you have denied any Request for Admissions served herewith, for each, state any and all
12 facts which form the basis upon which you deny the same and identify any and all documentation in
13 your possession or control which support the denial.

14
15 **ANSWER TO INTERROGATORY NO. 15:**

16 See responses to Interrogatories 1-14 above.

17 DATED this 7th day of March, 2011.

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POTTER LAW OFFICES

By 
CAL J. POTTER, III, ESQ.
Nevada Bar No. 1988
JOHN C. FUNK, ESQ.
Nevada Bar No. 9255
1125 Shadow Lane
Las Vegas, Nevada 89102
Attorneys for Plaintiff

1

2 **VERIFICATION**

3 I, JOYCE ZAIC, declare as follows:

4 I am a party to the within action. I have read the following **PLAINTIFF'S RESPONSES TO**
5 **DEFENDANTS MOUNTAINVIEW HOSPITAL, NEAL MILLOT AND CHRISTOPHER**
6 **SIMMS' FIRST SET OF INTERROGATORIES** and I know the contents thereof. The same is
7 true of my knowledge, except as to those matters which are herein stated upon my information and
8 belief, and as to those matters I believe them to be true.

9

10 I declare under penalty of perjury under the laws of the State of Nevada that the foregoing is
11 true and correct.

12

13

14

15 Executed this 7 day of March, 2011.

16

17

18

Joyce Zaic
JOYCE ZAIC

19

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21

Subscribed and Sworn to before

me this 7th day of March, 2011.

22

Michelle Karony
NOTARY PUBLIC



CERTIFICATE OF SERVICE

I HEREBY CERTIFY that pursuant to the Amended EDCR 7.26 and to NRCPS(b)
on the 7th of March, 2011, I did serve at Las Vegas, Nevada a true and correct copy of
**PLAINTIFF'S RESPONSES TO DEFENDANTS MOUNTAINVIEW HOSPITAL, NEAL
MILLOT AND CHRISTOPHER SIMMS' FIRST SET OF INTERROGATORIES**, on all
parties to this action by:

- Facsimile
 U.S. Mail
 Hand Delivery

Addressed as follows:

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